

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	:	
	:	<b>Case No.: 5:20-bk-02735-RNO</b>
<b>Frank J Spalletta AKA Frank Joseph Spalletta</b>	:	<b>Chapter 13</b>
<b>Lori A Spalletta AKA Lori Anne Spalletta</b>	:	<b>Judge Robert N. Opel II</b>
<b>Debtor(s)</b>	:	<b>*****</b>
	:	
	:	
<b>U.S. Bank National Association, as Trustee for Structured Asset Securities Corporation, Mortgage Pass-Through Certificates, Series 2006-EQ1</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>Frank J Spalletta AKA Frank Joseph Spalletta</b>	:	
<b>Lori A Spalletta AKA Lori Anne Spalletta</b>	:	
<b>Charles J DeHart, III, Trustee</b>	:	
<b>Respondents</b>	:	

**OBJECTION OF U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR  
STRUCTURED ASSET SECURITIES CORPORATION, MORTGAGE PASS-  
THROUGH CERTIFICATES, SERIES 2006-EQ1 TO CONFIRMATION OF THE  
AMENDED PLAN (DOCKET NUMBER 32)**

U.S. Bank National Association, as Trustee for Structured Asset Securities Corporation, Mortgage Pass-Through Certificates, Series 2006-EQ1 ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed First Amended Chapter 13 Plan ("Plan") filed by Frank J Spalletta AKA Frank Joseph Spalletta and Lori A Spalletta AKA Lori Anne Spalletta (collectively, "Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 3341 Shady Oaks Drive, Saylorsburg, PA 18353 ("Property").

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2. Creditor has filed Proof of Claim number 3 in the amount of \$37,203.08. This amount includes a pre-petition arrearage in the amount of \$3,967.94.
3. Debtor's Amended Plan proposes to pay Creditor's claim through the Plan in the amount of \$22,500.00 at 6.00% interest. This treatment complies with a settlement agreement between Creditor and Debtor, however the total payment amount reflected in the Plan is inaccurate. Creditor calculates the total payment amount at \$26,099.00, over a 60-month plan.
4. As a result, Debtor's Plan represents an impermissible modification of Creditor's claim and a violation of 11 U.S.C. §§1322 and 1325.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Amended Plan.

Respectfully submitted,

/s/ Adam B. Hall

Adam B. Hall, Esquire (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

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Columbus, OH 43216-5028

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Attorneys for Creditor

The case attorney for this file is Adam B. Hall.

Contact email is abh@manleydeas.com

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<b>Debtor(s)</b>	:	<b>*****</b>
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	:	
<b>U.S. Bank National Association, as Trustee for Structured Asset Securities Corporation, Mortgage Pass-Through Certificates, Series 2006-EQ1</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>Frank J Spalletta AKA Frank Joseph Spalletta</b>	:	
<b>Lori A Spalletta AKA Lori Anne Spalletta</b>	:	
<b>Charles J DeHart, III, Trustee</b>	:	
<b>Respondents</b>	:	

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Objection of U.S. Bank National Association, as Trustee for Structured Asset Securities Corporation, Mortgage Pass-Through Certificates, Series 2006-EQ1 to the Confirmation of the Amended Plan was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Charles J DeHart, III, Chapter 13 Trustee, 8125 Adams Drive, Suite A, Hummelstown, PA 17036, dehartstaff@pamd13trustee.com

Patrick James Best, Attorney for Frank J Spalletta and Lori A Spalletta, 18 North 8th Street, Stroudsburg, PA 18360, patrick@armlawyers.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on March 2, 2021:

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Frank J Spalletta AKA Frank Joseph Spalletta and Lori A Spalletta AKA Lori Anne Spalletta,  
490 Shady Oaks Drive W., Saylorsburg, PA 18353

Frank J Spalletta AKA Frank Joseph Spalletta and Lori A Spalletta AKA Lori Anne Spalletta,  
3341 Shady Oaks Drive, Saylorsburg, PA 18353

PHH Mortgage Services, 1 Mortgage Way, Mount Laurel, NJ 08054

DATE: 03/02/2021

/s/ Adam B. Hall

Adam B. Hall, Esquire (323867)

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